

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

---

DALE and JENNIFER HARRIS, as  
Parents and next friend of their minor son,  
RNH,

Plaintiffs,

v.

C.A. NO.: 1:24-CV-12437-WGY

MARGARET ADAMS, KATHRYN  
ROBERTS, RICHARD SWANSON,  
NICOLE NOSEK, SUSAN PETRIE,  
ANDREW HOEY, KAREN SHAW,  
JOHN BUCKEY, and TOWN OF  
HINGHAM SCHOOL COMMITTEE ,

Defendants.

---

**JOINT MOTION TO ALLOW PARTIES**  
**TO FILE REDACTED PLEADINGS AND EXHIBITS**

The parties jointly move this Honorable Court to allow the parties to file redacted versions of pleadings and exhibits publicly and unredacted versions under seal to the Court to the Court. In support of this Motion, the parties state the following:

1. This matter involves sensitive and private information about the minor plaintiff and potential another, non-party minor, who was involved with the subject assignment that is central to this matter.
2. The student records of these two (2) students are protected by the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g and its accompanying regulations, 34 C.F.R. Part 99, as well as the Massachusetts Student Records Regulations, 603 CMR §23.00.

3. In accordance with the Court's October 11, 2024 Order (Docket No. 19), the parties request that they be allowed to file redacted versions of the pleadings and exhibits publicly and unredacted versions under seal to the Court.

**WHEREFORE**, the parties jointly request that the Court allow the parties to file redacted versions of the pleadings and exhibits publicly and unredacted versions under seal to the Court.

Plaintiffs,  
DALE and JENNIFER HARRIS, as  
Parents And Next Friend of Their  
Minor Son, RALPH NICKOLAUS  
HARRIS,  
By their attorneys,  
FARRELL LAVIN, PLLC

*/s/ Peter S. Farrell*

---

Peter S. Farrell (BBO No.: 656512)  
46 Railroad Avenue, Suite 204  
Duxbury, MA 02332  
(781) 236-3620  
[pfarrell@farrelllavin.com](mailto:pfarrell@farrelllavin.com)

Defendants,  
Margaret Adams, Kathryn Roberts, Richard  
Swanson, Nicole Nosek, Susan Petrie,  
Andrew Hoey, Karen Shaw, John Buckey  
and Town of Hingham School Committee,  
By Their Attorneys,

*/s/ Gareth W. Notis*

---

Gareth W. Notis, BBO #637814  
[gnotis@morrisonmahoney.com](mailto:gnotis@morrisonmahoney.com)  
MORRISON MAHONEY LLP  
250 Summer Street  
Boston, MA 02210-1181  
Phone: 617-737-8857  
Fax: 617-342-4821

### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 18, 2024

*/s/ Gareth W. Notis*  
\_\_\_\_\_  
Gareth W. Notis